



# California Fair Political Practices Commission

December 10, 1992

Tom Parks, et al.  
4907 East Hatch Road  
Hughson, CA 95326

Re: Your Request for Advice  
Our File No. A-92-631

Dear Mr. Parks:

You have requested advice under the campaign disclosure provisions of the Political Reform Act (the "Act").<sup>1</sup>

You have asked if there are reporting requirements under the Political Reform Act for a group of individuals that spent \$276 on a letter opposing a ballot measure.

The Act provides that "committees" must file campaign disclosure statements at specified intervals. (Sections 82013; 84100, et seq.)

Section 82013 defines "committee" as any person or combination of persons who directly or indirectly does any of the following:

- (a) Receives contributions totaling one thousand dollars (\$1,000) or more in a calendar year; or
- (b) Makes independent expenditures totaling one thousand dollars (\$1,000) or more in a calendar year; or

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<sup>1</sup> Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

(c) Makes contributions totaling ten thousand dollars (\$10,000) or more in a calendar year to or at the behest of candidates or committees.

Based on the information you have provided concerning the financial activity of the individuals, the group did not qualify as a committee and is not required to file a campaign disclosure statement.

If you have further questions concerning this letter, please contact me at (916) 322-5662.

Sincerely,

Scott Hallabrin  
Acting General Counsel

A handwritten signature in cursive script, reading "Sandra L. Silva".

By: Sandra L. Silva  
Political Reform Consultant  
Technical Assistance Division

ADVICE LETTER # A 92-631 REQUESTER: PARKS, Tom

This letter was written by: Silva, Sandra

The 21 working-days expires: 12/16/92

However, a response has been requested by: \_\_\_\_\_

Upon review, return to: Silva, Sandra

\*\*\*\*\*  
DIVISION CHIEF, TA&A

CW APPROVED

Comments to Executive Director and Chairman: \_\_\_\_\_

\*\*\*\*\*  
GENERAL COUNSEL:

JA APPROVED

X Without change

\_\_\_\_ See changes noted in letter

General Comments/Thoughts: \_\_\_\_\_

\_\_\_\_ NOT APPROVED

Reasons/Comments: \_\_\_\_\_

\*\*\*\*\*  
EXECUTIVE DIRECTOR:

\_\_\_\_ APPROVED

\_\_\_\_ Without change

\_\_\_\_ See changes noted in letter

General Comments/Thoughts: \_\_\_\_\_

\_\_\_\_ NOT APPROVED

Reasons/Comments: \_\_\_\_\_

4907 East Hatch Road, Hughson, California 95326

California Fair Political Practices Commission  
428 J. St, Suite 600  
Sacramento, California 95812

FPPC

Nov 16 12 29 PM '92

Dear Sirs;

We the below signed Stanislaus County farmers would like to inform you that we as Farm Bureau members authored a letter to other members of the Stanislaus Farm Bureau because the Farm Bureau would not let us publish our letters in our own newspaper.


We did this without the knowledge or consent of the SAFE committee in support of Measure F.


We are not a FPPC committee and did not solicit funds for this project. We spent a total of \$276.00 for this which was paid for by one of us.

If we are required to file any papers please inform us and we shall do so.

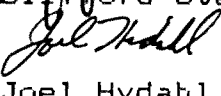
We are not political just farmers trying to save our farmland and communicate with our fellow members of the Farm Bureau.

  
Tom Parks

  
Clifford Starn


  
Grant Lucas

  
Joyce Warner


  
Joel Hydahl

  
David Raube

  
Clifford Starn

  
Dennis Serpa

  
Mervin Crow

  
Al Pogolotti

  
Hurley Couchman

  
Larry Hooker



Exhibit A There are numerous points of misinformation presented in the argument against Measure F. Is the Farm Bureau interested in preserving our farming heritage or farm land development?

# Stanislaus County Farm Bureau

1201 L Street • P.O. Box 3070 • Modesto, California 95353 •

## REBUTTAL TO ARGUMENT IN FAVOR OF MEASURE F

Measure F will not preserve or protect Stanislaus County's agriculture or farming economy. IN FACT:

Measure F will not protect farmland. In the past 40 years, 98% of all urban growth has occurred in the cities. Measure F does not address this issue, rather, it punishes farmers for the growth of the cities. Additionally, Measure F only addresses farm lands that lie in irrigation districts. This means over 400,000 acres of county land, including some of the most productive farmland, would have no protection against development. Measure F could actually encourage development in the east and west side areas of the county.

Measure F could result in a costly legal battle. The Stanislaus County Superior Court has stated: "...there are some arguably meritorious challenges to several areas of the initiative. ... concerns could require a future court to strike all or part of this initiative." A similar measure in Napa County is undergoing numerous legal challenges. Resulting legal fees are costing local taxpayers hundreds of thousands of dollars.

Measure F takes away property rights. It prohibits "small" farmers from dividing their 60 to 75 acre farm among their children. Farmers will be unable to construct housing for workers and will be prohibited from even asking the county if they may build an additional home on their property for a family member.

Measure F is opposed by virtually every farming, business and employment organization in our county. By voting "NO" on Measure F you will be saving tax dollars, jobs, rights and our farming heritage.

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Paul J. Wenger, Farmer-President Stanislaus Farm Bureau  
CY C. Young Jr., Farmer, Family Farm Alliance  
Joy L. Blommingcamp, Oakdale farmer  
Nick W. Blom, Farmer  
Tom Mayfield, Hughson Farmer

**"WE'RE FARM BUREAU . . . WE'RE FAMILY!"**



*Building Industry Association*  
of  
**Central California, Inc.**

1401 "F" STREET



PHONE 529-4531

MODESTO, CA 95354

DATE: July 10, 1992  
TO: All BIACC Members  
FROM: Ed Taczanowsky *ET*  
Executive Vice President  
BIA of Central California  
SUBJECT: Family Farm Alliance Information Campaign,  
Anti S.A.F.E. Fund Raiser



In order to successfully launch an informational campaign against the devastating effects of the "Twenty-year Land Use Restriction Initiative for Agricultural Land in the Unincorporated Areas of Stanislaus County," more commonly known of as "S.A.F.E.," farmers and businessmen alike have formed a broad based coalition that needs your financial support:

The members of the Family Farm Alliance (FFA) wish to defend business and family interests against the hidden agenda of the misnomered S.A.F.E. initiative. They are asking your help and that of the voting public to insure the defeat of this ill conceived initiative.

To make a contribution to the preservation of agricultural land owner's rights as we have always known them in the County, in our lifetimes, please help support this very important cause by making out a check to THE FAMILY FARM ALLIANCE for NO MORE than \$99.00. Send it to the BIA immediately. Your support of this informational campaign is very much appreciated.

*Why to the BIA & not DIRECT!*

Affiliated with

NATIONAL ASSOCIATION  
OF HOME BUILDERS

CALIFORNIA BUILDING  
INDUSTRY ASSOC.

To: Stanislaus County Farmers

It has become apparent to Farm Bureau members and farmers who support Measure F (SAFE) that there is a great deal of confusion concerning the intent and scope of the initiative. The BIACC (Building Industry Association of Central California) and other long time foes of farm preservation have intentionally misled the general public in an attempt to defeat Measure F.

Lets separate fact from fiction.

1. Measure F IS NOT a new set of regulations designed to further burden the farming community. It is intended to amend the existing Stanislaus County General Plan. It DOES NOT do the following:

- a. DOES NOT remove any provisions of the current general plan. (Yes, you ARE NOT restricted from selling your property)
- b. DOES NOT take away any existing rights or permitted uses. (Such as the right to construct labor housing)
- c. DOES NOT block any development that voters are convinced would be beneficial for our county

2. Measure F DOES NOT replace current agricultural zoning as defined by the current Stanislaus County General Plan. Rather, Measure F PREVENTS the reduction of existing agricultural zoning on the County's most productive lands. This is a very important aspect of this Initiative. Currently it would take only THREE VOTES by the Stanislaus County Board of Supervisors to overturn protective farm zoning.

3. Measure F PROTECTS the Williamson Act. Measure F would protect the Williamson Act for the life of the Initiative. Most land owners seem to have forgotten that in order for the county to qualify for the Williamson Act, first the county had to adopt agricultural zoning. The BIA IS NOT interested in your right to farm under the protection of the Williamson Act.

4. Measure F WILL NOT result in lower property values. Measure F DOES NOT impact cities "current spheres of influence" or the ability of cities to amend their "spheres of influence" through LAFCO. There are presently more than 25,000 acres of land within the existing "spheres of influence". This is enough to provide housing and industrial growth for the next twenty years.

5. Farmers WILL BE able to construct labor housing. The opponents of Measure F have distorted the truth about Measure F. Measure F DOES NOT change any of the agricultural uses now permitted under the County's General Plan.

6. Measure F was drafted by the same Law firm that drafted a similar measure for Napa County. The Napa County Board of Supervisors DID NOT challenge the Initiative and DID NOT incur "hundreds of thousands of dollars" defending a similar initiative as is claimed in the "Rebuttal to Arguments in Favor of Measure

F". In fact, the BIA LOST and there are now NO legal challenges in the courts concerning the Napa Initiative. This is just one example of a distorted "fact" by the opponents of Measure F that appears in the "Rebuttal to Argument in Favor of Measure F". There are numerous distorted "facts" in this "distorted" rebuttal. (See Exhibit A)

7. The four members of the Stanislaus Board of Supervisors who voted to DENY you your right to Vote on this initiative have unnecessarily cost the county taxpayers much needed revenue. We can thank the Family Farm Alliance for this unnecessary cost.

8. The Napa County Farm Bureau supported the land use initiative in Napa County. The Stanislaus County Farm Bureau director voted to OPPOSE Measure F. They also voted NOT to allow Farm Bureau members, who support Measure F, advertising supporting Measure F in the Stanislaus Farm News. They also voted to allow only THREE letters in support of Measure F to be run in the paper. We are currently filing a protest with the U.S. Postal Department. We believe a policy that allows the FAMILY FARM ALLIANCE the right to use the Stanislaus Farm News and DENIES farm bureau members supporting SAFE the same privilege is in violation of U. S. Postal regulations not to mention our Constitutional rights.

Great care was taken in the drafting of this initiative to insure that the Constitutional Rights of landowners were not violated. Those rights were not only preserved but your right to farm without the threat of needless development in agricultural zones will be strengthened with the passage of Measure F. The BIA lost in Napa County because the Napa County Farm Bureau saw the wisdom of supporting the preservation of its greatest asset, farm land. We need to recognize the wisdom of that decision and preserve that industry that provides more jobs and income to this county than any other industry.

In the coming weeks the BIA through the Family Farm Alliance is planing a major media blitz to discredit Measure F and confuse the electorate. We need your help in setting the record straight. (See Exhibit B, BIA Memo)

For further information, Call 524-6473

#### Stanislaus Family Farmers and Ranchers

Patty Crow West Side  
Joel Hidahl Ceres  
Larry Hooker Hickman  
Grant Lucas Ceres  
Tom Parks Hughson  
Rolland C. Starn Hughson

Al Pogolotti Jr. Oakdale  
David Raube Ceres  
Dennis Serpa Turlock  
Clifford Starn Hughson  
Joyce Warner Hickman  
Hurley Couchman Modesto